

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
CIVIL ACTION NO. 5:20-CV-073-KDB-DCK \*SEALED\*

UNITED STATES OF AMERICA )  
*ex rel.* JILL REID; and JILL REID, )  
individually, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
IREDELL PHYSICIAN NETWORK, )  
LLC AND RUBY GRIMM, M.D. )  
 )  
Defendant. )

**FILED UNDER SEAL**

**THE UNITED STATES' NOTICE OF ELECTION TO INTERVENE  
IN PART TO EFFECTUATE SETTLEMENT AGREEMENT AND MOTION TO  
UNSEAL CERTAIN CASE DOCUMENTS**

The United States and Defendant Iredell Physician Network, LLC (“IPN”) have reached a settlement to resolve certain claims brought on behalf of the United States by relator Jill Reid (“Relator”), pursuant to the False Claims Act, 31 U.S.C. §§ 3729-3733. The United States, IPN, and Relator have entered a settlement agreement effective September 28, 2022 (attached as Exhibit A to this Notice, hereinafter the “Settlement Agreement” or “Agreement”). In light of the parties’ Agreement, and for the purpose of effectuating and formalizing that resolution, pursuant to §§ 3730(b)(2) and (4), the United States respectfully advises the Court of its decision to intervene in this case in part for the purposes of settlement, but only as to Defendant IPN and only as to the Covered Conduct, as that term is defined in Paragraph D of the Settlement Agreement. The United States declines to intervene as to all other Defendants and as to all other allegations.

Upon receipt of the payments described in Paragraphs 1 and 3 of the Settlement Agreement, the United States and Relator will file a joint stipulation of dismissal of all claims brought on behalf of the United States pursuant to the False Claims Act, specifically, Counts I, II and IV.<sup>1</sup> At the time of this filing, the United States is informed that Relator is not dismissing her individual claim for retaliation and wrongful termination against IPN, as set forth in Count V.<sup>2</sup>

Finally, the United States requests that the Relator's Complaint, this Notice, and the attached proposed Order be unsealed. The United States requests that all other papers on file in this action remain under seal because in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

A Proposed Order accompanies this Notice.

Respectfully submitted this the 4th day of October, 2022.

DENA J. KING  
United States Attorney

**s/Katherine T. Armstrong**  
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**s/Julia K. Wood**  
JULIA K. WOOD  
ASSISTANT UNITED STATES ATTORNEY  
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<sup>1</sup> There is no Count III contained in the Complaint.

<sup>2</sup> The United States is not a party to the Relator's individual retaliation and wrongful termination claim.

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**CERTIFICATE OF NON-SERVICE**

Because this action is under seal pursuant to 31 U.S.C. § 3729 *et seq.*, Defendants have not been served with a copy of the foregoing Notice of Intervention.

This the 4th day of October, 2022.

**s/Katherine T. Armstrong**  
KATHERINE T. ARMSTRONG  
ASSISTANT UNITED STATES ATTORNEY

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of October, 2022, the foregoing Notice of Intervention was served upon the party below by electronic mail:

Benjamin Lin  
Ben.lin@jtblawgroup.com  
*Counsel for Relator*

**s/Katherine T. Armstrong**  
KATHERINE T. ARMSTRONG  
ASSISTANT UNITED STATES ATTORNEY